

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION



Dr. Orly Taitz, et al.

PLAINTIFF(S)

VS.

CIVIL ACTION NO. 3:12cv280 HTW-LRA

Democrat Party of Mississippi, et al.

DEFENDANT(S)

RICO NOTICE

In this action, claims have been asserted under the Racketeer Influenced and Corrupt Organization Act ("RICO"), 18 U.S.C. § 1961. Under the current practice of the presiding judge, all parties filing RICO claims must file a RICO statement conforming to this Notice.

The Plaintiff shall file, within twenty (20) days hereof, a RICO case statement. This statement shall include the facts the Plaintiff is relying upon to initiate this RICO complaint as a result of the "reasonable inquiry" required by Federal Rule of Civil Procedure 11. This statement shall be in a form which both uses the numbers and letters as set forth below, and states in detail and with specificity the following information:

1. State whether the alleged unlawful conduct is in violation of 18 U.S.C. §§ 1962(a), (b), (c), and/or (d). Yes it is.

2. List each Defendant and state the alleged misconduct and basis of liability of each
Obama placed his name on the ballot by virtue of fraud and use of forged Birth certificate and a fraudulently obtained Social Security number

Michel Astrue-aided and abetted Obama in cover up of the social Security fraud
Alvin Onaka, aided and abetted Obama in placement in official records a computer generated forgery and cover up of this forgery. Loretta Fuddy-director of health of HI, aided and abetted Obama, participated in cover up
Obama for America financed the scheme by illegally raising funds for Obama
Secretary of State and Democratic Party of Ms took part in RICO enterprise by covering up Obama's forged IDs and all evidence provided to them by Plaintiffs in 2008 in Thomas v Hosemann and in 2012 by Taitz

Nancy Pelosi, in her capacity of a chairwoman of the Democratic National convention worked together with Obama and Jane and John does and changed the certificate of candidate sent to HI on Obama's behalf

3. List the alleged wrongdoers, other than the Defendant(s) listed above, and state the alleged misconduct of each wrongdoer.

former chairman and secretary of the Democratic party of Hawaii: Brian Schatz and Lynn Matusow -falsified the certificate of a candidate

Members of subversive organizations, such as "Fogbow", who participated in harassment of Taitz

Subversive organizations and individuals created to aid and abet Obama's use of forged IDs by inflicting collateral attack on civil right attorneys and Civil rights leaders

"Obama for America"

"Fogbow"-subversive organization, created with the purpose of aiding and abetting Obama in usurpation of U.S. Presidency with forged IDs and by defaming and slandering civil rights leaders, like Plaintiffs herein, who are bringing civil challenges to Obama and destroy their ability to make a living.

Financial backers to "Obama for America" and Fogbow, specifically the largest financial backer **believed to be billionaire George Soros**. further discovery will be necessary to ascertain identity of backers and members of "Fogbow"). Financial backer of Fogbow organized and financed May 25, 2010 convention of fogbow in Phoenix, Arizona. One of the main topics of fogbow convention was derailment of the political run for the CA secretary of State by attorney Taitz. Taitz announced in her campaign, that if she wins, she as a secretary of state of CA will be seeking original IDs for Obama

Fogbow consists of a number of attorneys, who work for high ranked judges as clerks or staff attorneys, for IRS, state bars, military attorneys and other organizations. they used their positions to aid and abet Obama and slander, defame and impoverish ones who sought legal resolution and prosecution of forgeries by Obama

Fogbow attorneys used pseudonyms

One of the organizers of Fogbow is a California attorney and an attorney for the Democratic party - **Scott J. Pepper, who uses a pseudonym "Sterngard Fiegen"**. Pepper is a part time investigator for the CA bar. Pepper misused and abused his position as a part time investigator to launch collateral attacks on Taitz, in order to attack her CA license and prevent her from going after Obama and his forged IDs. While CA bar decided not to take any action against Taitz, she suffered **over \$10,000 financial damage** in legal fees having to hire attorneys, specializing in bar representation to fend attacks by Pepper. Typically bar investigates complaints coming from clients or parties to legal actions. Pepper was never a client of Taitz or a party to any legal action, where she was either a party or attorney. Pepper abused his position as a California bar investigator, went with a thin tooth comb through any legal action, where Taitz was a party and bombarded CA bar with complaints seeking to attack her license in order to prevent her from representing other parties against Obama. at the same time Pepper co-founded subversive organization "Fogbow", used pseudonym Sterngard Fiegen and attacked Taitz with defamatory remarks, sexually charged remarks, seeking de-humanize her, assassinate her character. His remarks, as well as remarks of other members of Fogbow resulted in estimated damage of **over \$500,000** in lost income for Taitz in her dental practice. Additionally, members of Fogbow wrote to multiple dental insurance companies seeking to affect Taitz contracts with those insurance companies. Members of Fogbow and others wrote defamatory statements to tenants, who subleased office space from Taitz. Those tenants were harassed and intimidated. Lost

rental income is estimated to be over \$400,000. Members of Fogbow and others harassed and intimidated clients and witnesses of Taitz, seeking their withdrawal from cases. this harassment and intimidation resulted in estimated loss of income of over \$500,000 for Taitz, as an attorney, in her legal practice.

Bill Bryan, uses pseudonym "Foggy", a former CA attorney, who rescinded from the CA bar in the midst of discipline investigation and after multiple suspensions.

Mitzi Craig Torri, AZ attorney, had another license (believed to be PA license). Torri uses a pseudonym "Butterfly Bilderberg". Torri is an attorney for the IRS. Further discovery is necessary. It is believed that Torri used her position as an IRS attorney to cause financial hardships to Plaintiffs and other civil rights attorneys and civil rights leaders who were seeking adjudication on the merits of Obama's forgeries.

Staff attorneys, law clerks, employees of several courts, who worked in a coordinated effort to manipulate dockets, manipulate cases in order to derail any legal challenges to Obama. Some of these attorneys worked in concert with at least two convicted forgers, who directly or through their attorneys submitted perjured statements to courts in order to derail cases challenging Obama. One of attorneys engaged in derailment of anti Obama cases is believed to be an attorney for Perkins Coie, Siddharth Velamoor, who worked as an attorney for Judge David O. carter, who presided over the cases Keys, Barnett et al v Obama et al.

Convicted forgers: John Does worked in coordinated attacks with a number of attorneys and attorney law clerks for presiding judges to defame Taitz in collateral attacks on Taitz in order to prevent her proceeding against Obama

Computer Hackers-Currently identified as John Does, hacked and destroyed her e-mail accounts and web sites

"Oh for Goodness sakes"- subversive web site, created to defame and slander civil rights attorneys, and civil rights leaders who bring forward legal challenges against Obama and to destroy ability of such attorneys to make a living

"Orly's World"- web site created to defame civil rights leaders and attorneys, who bring forward evidence of forgery in Obama's documents and to affect ability of civil rights attorneys and leaders to make a living

"Orly's World" was created by New Jersey and PA attorney Steven Feinstein. Feinstein's license in NJ was not renewed. His license in PA was suspended for over a year.

John Does, creators of Fake websites, fake Facebook accounts, fake twitter accounts Such accounts created to disinform the public about the work conducted by Taitz, assassinate her character and limit her ability to make income as a doctor and attorney. Damage estimated to be over \$500,000.

A group of forgers used to aid and abet Obama: John Does, forgers who forged Obama's birth certificate, Selective Service certificate and created a Social Security card with a number which belonged to an individual born in 1890

Employees of the Social Security administration, currently listed as John Does, who aided and abetted Obama in creating a forged SSN. An individual, suspected to be one of those John Does is the former actuary of the Social Security Administration **Harry C. Balantyne** According to investigation by former Scotland yard officer Neil Sankey and according to investigation of licensed investigator Susan Daniels one of the Social Security numbers used by Obama is the Social Security number of Balantyne's deceased mother.

Jon Doe, Believed to be Obama's step brother, Mark Ndsandjo (AKA Mark Obama, AKA Mark Nydsend), whose social Security number was used as one of the number used by Obama according to national databases.

BARACK HUSSEIN OBAMA – with address 1600 Pennsylvania Avenue NW Washington, DC 20500, who is sued as a candidate for the U.S. President in 2012 elections, who is using a stolen Connecticut Social Security number xxx-xx-4425 and running for the US President by virtue of fraud and use of forged and fraudulently obtained identification. **NANCY PELOSI**, Chairwoman of the 2008 Democratic National Convention and Signor of the Certificate of Nomination for Candidate for President Obama with the address: Democratic Party Headquarters, 430 South Capitol St. SE, Washington DC, 20003; **MICHAEL ASTRUE**, Commissioner of SSA with the business address: Social Security Administration, 6401 Security Blvd. Baltimore, MD 21235; **WILLIAM A. CHATFIELD**, former Director of the Selective Service, resident of TX ; **ALVIN ONAKA**, registrar of the Health Department of Hawaii -involved in the cover up of Obama's forged birth certificate; **BRIAN SCHATZ**, Chairman of the Democratic party of Hawaii and Signor of the Certificate for Presidency for Barack Obama with the business address as: 1050 Ala Monana Blvd. #2660, Honolulu, HI 96814; **LYNNE MATUSOW**, Secretary of the Democratic party of Hawaii and Signor of the Certificate for Presidency for Barack Obama with the business address as: 1050 Ala Moana Blvd. #2660, Honolulu, HI 96814.; **BALLOT LAW COMMISSION of State of New Hampshire** with the address: 107 North Main Street, State House, Room 204, Concord, N.H. 03301; **CLAY D. LAND**, Federal Judge with the business address: Middle District of Georgia, PO Box 2017, Columbus, GA 31902; **JOHN AVLON**, a reporter from Daily Beast, with the business address: The Daily Beast, 7 Hanover Sq. New York, NY, 10004.; **CHRIS MATTHEWS**, a host from MSNBC with the business address: MSNBC, One Microsoft Way, Redmond, WA 98052. **MSNBC, a TV broadcast company with a business address as: MSNBC, One Microsoft Way, Redmond, WA 98052; KFI AM 640, a radio station** with a business address as: 3400 W Olive Ave Ste 550, Burbank CA 91505, **JOHN & KEN SHOW, a show on KFI AM 640** engaged in defamation of Plaintiff Taitz. The business address is: 3400 W Olive Ave Ste 550, Burbank CA 91505, **JOHN KOBELT, a host of JOHN & KEN SHOW on KFI AM 640** with the business address as: 3400 W Olive Ave Ste 550, Burbank CA 91505. **FORBES MAGAZINE**, located at : 60 Fifth Avenue, New York, N.Y. 10011, **KEVIN UNDRHILL, a reporter for Forbes Magazine** with the business address as: 60 Fifth Avenue, New York, N.Y. 10011. **OBAMA FOR AMERICA, an organization created by Barack Hussein Obama with the business address** as: P.O. Box 803638, Chicago, IL, 60680, **PATRICK R. DONAHOE the Post Master General and Chief Executive Officer of United States Postal Service** with business address as: 475 L'Enfant Plaza SW, Washington DC 20260, **CNN**-is a corporation, a news organization that was and is actively complicit in fraud and cover up of Obama's forged IDs. Current known address for CNN is P.O. Box 105366 One CNN Center , Atlanta GA 30348; JOHN DOES and JANE DOES 1-100 Plaintiffs will provide the names of defendants John Doe and Jane Doe upon further discovery.

FRAUD Predicate Act

1. Barack Hussein Obama (Hereinafter Obama) never provided any valid documentary evidence of his natural born status, which is required for one to be a candidate for the U.S. Presidency according to the Article 2, section 1 of the U.S. Constitution.

2. Obama placed his candidacy on the ballot claiming to be a natural-born citizen based on forged identification papers.

3. A natural born citizen would be expected to have valid U.S. identification papers, such as a valid long form birth certificate and a valid Social Security number, lawfully obtained by presenting a valid birth certificate to the Social Security Administration and which can be verified through official U.S. Social Security verification services, such as E-Verify and SSNVS.

4. The most glaring evidence of Obama's lack of natural born status and legitimacy for the US Presidency, is Obama's lack of most basic valid identification papers, such as a valid Social Security Number ("SSN") and his use of a fraudulently obtained Social Security Number from the state of Connecticut, a state where he never resided, and which was never assigned to him according in part to SSN verification systems "E-Verify" and SSNVS.

. Obama used one or more Social Security numbers, that were not assigned to him.

. Obama used a forged Selective Service certificate.

. Obama held April 27, 2011 press conference, presenting a forged birth certificate and attacking "birthers".

Obama refused to comply with any subpoenas and notices to appear in court or elections commission or election board hearing in relation to his identification papers.

Obama acted through his agents, such as aids, press secretaries, attorneys, governmental officials, members of the media loyal to Obama and controlled opposition members of the media, campaign workers, his web site "Fight the Smears" and "Obama for America" in order to defraud the Plaintiffs and others and in order to attack, harass, defame, slander and persecute Plaintiffs and other patriots seeking to get expose Obama's forged documents.

Defendant "Obama for America" is a RICO organization created by Obama and his accomplices with a goal of subsidizing elections fraud.

b) Fraud by defendant Alvin Onaka

34. **Defendant Alvin Onaka, Registrar of the state of Hawaii**, aided and abetted Obama and was complicit in the cover up of the fact that Obama is using a forged birth certificate from the state of Hawaii. Onaka refused to provide an original Birth certificate or original microfilm for examination

- *c) Fraud by Defendant Astrue*

35. Defendant Michael Astrue, commissioner of the Social Security, aided and abetted Obama by covering up the fact that Barack Obama is fraudulently using a Connecticut Social Security number, xxx-xx-4425, which was issued in and around 1977 in the State of Connecticut to a resident of Connecticut born in 1890 and that this Social Security number does not pass E-verify, when checked under the name Barack Obama.

- *d) Fraud by Defendants Schatz and Matusow*

36. Brian Schatz is being sued in his capacity as former Chairman of the Democratic party of Hawaii, and Lynn Matusow is being sued as the Secretary of the Democratic Party of Hawaii. Schatz and Matusow aided and abetted fraud committed by Obama when they signed an altered/falsified Official Certificate of Nomination for Barack Obama and removed the necessary wording "eligible according to the US Constitution". Official Certification of Nomination for Al Gore -2000 and for John Kerry 2004 submitted by the Democratic party of Hawaii to the office of elections. Those certifications show the necessary wording that the candidates for President and Vice President are "legally qualified to serve under the provisions of The U.S. Constitution". In order to aid Obama and to attempt to avoid criminal liability in certifying a fraudulent Official Certification of Nomination, Brian Schatz and Lynn Matusow falsified the Certificate of Nomination and

removed the words "eligible to the U.S. Constitution" from the certification sent to Hawaii Office of Elections on behalf of Obama. Obama's Official Certification of Nomination states "This is to certify that the following candidates for President and Vice President of the United States are legally qualified to serve under the provisions of the Democratic Parties balloting at the Presidential Preference Poll and Caucus held on February 19th 2008 in the state of Hawaii and by acclamation at the national Democratic Convention held August 27, 2008 in Denver, Colorado."

e) Fraud by Defendants Nancy Pelosi and Alice Germond

37. **Nancy Pelosi and Alice Germond** aided and abetted fraud committed by Obama when, as a former Chairwoman and Secretary of the 2008 Democratic National Convention, they signed an altered certificate of nomination to the State of Hawaii. Certification of Nomination for John Kerry, which was sent to all 50 states in 2004 and certification for Obama, which was sent to 49 states in 2008 were identical. However, Obama could not get on the ballot in general election, as the state of Hawaii required the wording "eligible under the provisions of the U.S. Constitution" and Brian Schatz and Lynn Matusow, who resided in Hawaii were not willing to sign the certification with such wording, as it was common knowledge among Hawaiian officials that -none of the Hospitals in Hawaii had any valid birth certificates for Obama, therefore, Obama was not a natural born

citizen and did not qualify. Subsequently Pelosi, Germond, Schatz, Matusow and Obama acted in concert, as Schatz removed the necessary wording from the certification sent by the Democratic party of Hawaii and Pelosi added this wording to the DNC certification. Through this scheme, Schatz, Matusow, Pelosi and Germond acted in concert and aided and abetted ineligible Obama to get on the ballot in 2008 election. Through manipulation of certificates, Schatz and Pelosi were complicit in fraud and forgery of records.

f) Fraud by Defendant Holder

38. Eric Holder is being sued as the Attorney General of the United States, who received from Taitz a Quo Warranto complaint as well as multiple criminal complaints with evidence of Obama and others committing massive elections fraud and Obama usurping the position of the U.S. President and Commander in Chief by virtue of fraud, misrepresentation and use of forged and fraudulently obtained identification papers. Holder aided and abetted Obama by burying the matter and not responding to Quo Warranto and not prosecuting Obama. He aided and abetted Obama by being complicit and covering up the fact that a foreign national with all forged papers is usurping the U.S. Presidency. Holder put his cushy job ahead of his oath of office to defend and protect the U.S. Constitution.

39. g) **Fraud by Defendant Napolitano**

Defendant Napolitano is being sued in her capacity as the director of Homeland Security.

Defendant Napolitano received certified mail complaints from Taitz and multiple other individuals advising her that Obama is committing massive elections fraud and using forged identification papers and fraudulently obtained Connecticut Social security number.

Defendant Napolitano aided and abetted Obama by being complicit and covering up the fact that a foreign national with all forged papers is usurping the U.S. Presidency. Napolitano put her cushy job ahead of her oath of office to defend and protect the U.S. Constitution.

Fraud by Defendants Secretaries of States of Mississippi, California, Georgia, New Hampshire, West Virginia, as well as Ballot law commission of New Hampshire.

Defendants SECRETARY OF STATE OF MISSISSIPPI and Democratic Party of MISSISSIPPI were among the first to be put on notice of the fact that Obama is using forged IDs. Former Superior Court of Mississippi Judge James Bell together with attorneys from the state of TN, VA and HI filed a legal action challenging legitimacy of Obama for the U.S. Presidency. This legal action was

brought on November 3rd, 2008 prior to 2008 election taking place. This legal action Thomas v Hosemann 08-241 Southern District of MS was brought on behalf of 28 electors from all over the country against Secretary of State of MS Delbert Hosemann. Complaint stated "... That a growing number of questions have arisen in litigation in at least ten (10) states contesting whether Senator John McCain and Senator Barack Obama are natural born citizens and, therefore, constitutionally eligible to be entrusted with the office of President of the United States. In the litigation against Senator Obama, allegations were made that **his admitted dual citizenship in Kenya and Indonesia, and lack of evidence that he renounced the same, caused a loss of his U.S. Citizenship as a matter of law. Moreover, evidence released by the Obama campaign purporting to be a "Certification of Live Birth" on its face appears to manufactured and unauthentic. See Exhibit A.** This evidence was released to FactCheck.org, an Annenburg related agency which seeks to determine the veracity of certain claims made in public forums." From before November 2008 election defendant Delbert Hosemann, Secretary of State of MS, and the Democratic Party of MS were on notice that Obama is using forged IDs. Secretary of State of MS is a chief elections officer, in whose hands legitimacy of elections is entrusted In spite of evidence of forgery in Obama's short form birth certificate Hosemann certified Obama as a legitimate candidate in 2008. Hosemann continued cover up through now. In January 2012 Taitz provided Democratic Party of MS and Secretary of State of MS with evidence of Obama using a forged long form birth certificate, forged selective service certificate, fraudulently obtained CT Social Security number, a last name not legally his and foreign citizenship. Defendants Democratic Party of MS and Secretary of State were complicit in cover up and racketeering scheme, where they failed to act, even though per MS elections laws, elections challenges have to be considered by the party the candidate belongs to and

by the Secretary of State. Due to actions of the defendants the racketeering scheme continued and defendants suffered damages

40. Defendants Secretaries of States of California, Georgia, New Hampshire, West Virginia, as well as Ballot law commission of New Hampshire received from Taitz evidence in the form of sworn affidavits showing Obama being a foreign national, who is usurping the U.S. Presidency by virtue of fraud and use of forged identification papers and intending to do so for four more years. Defendant Secretary of State of West Virginia received formal complaints and election challenges from Plaintiff Judd, who was the Democratic party candidate for the U.S. Presidency in the Democratic primary election.

Secretary of state of New Hampshire and the Ballot Law Commission of New Hampshire received election fraud complaints/election challenge from State Representatives Lawrence Rappaport, Carol Vita, Lucien Vita, Plaintiff Orly Taitz, Plaintiffs -candidates Lax and Macleran. State of New Hampshire allows any citizen from any state to file an election challenge and election fraud complaint.

Defendants Secretaries of State and Ballot Law Commission of New Hampshire were complicit with Obama and committed elections fraud by knowingly and maliciously allowing Obama on the ballot as a legitimate candidate for the U.S.

President, while knowing that Obama committed fraud and placed his name on the ballot by virtue of fraud and misrepresentation, knowing that he is a citizen of Indonesia and that he is fraudulently representing himself as eligible on the ballot using forged and fraudulently obtained identification papers and stolen Social Security number

g) Fraud by Defendant Land

**g) Aiding and Abetting Fraud by Defendant PATRICK R. DONAHOE-
Postmaster General**

70. Taitz submitted to Donahoe a complaint, which provided Donahue with evidence of Obama committing fraud and using a forged postal stamp on his alleged Selective Service certificate. Namely, U.S. postal stamp which was affixed to Obama's Selective Service certificate contained only two digits "80" , while other documents from 1980 showed a 4 digit postal stamp "1980".

71. Additionally Taitz forwarded to Donohue a video-tape with presentation by Sheriff Joseph Arpaio of Maricopa county Arizona, showing how Obama's selective service certificate was forged and how 2008 postal stamp was cut in half, reversed and used as 1980 stamp with only two digits "80" .

Donahue had in front of him evidence of the most serious crime being committed: most serious breach of the U.S. national Security and use by a foreign national a forged U.S. postal stamp in order to get into the position of the U.S. President.

Donahoe became criminally complicit when he took no action and covered up this crime.

h) Fraud by defendant CNN

72. In and around of April of 2011 CNN issued a report "Busting The Birther Conspiracy Theory. President's long form birth certificate released more than a year agoA video clip of the report can be seen on You-tube <http://us.mg6.mail.yahoo.com/neo/launch?.rand=71sdc0s28p5ea>. Within the report CNN placed a microfilm of a birth certificate from the state of Hawaii claiming it to be a birth certificate of Obama. Upon magnification of the image, it is clear that this is not a microfilm of Obama's birth certificate, but an image of a certificate of a completely different person. CNN, who claims to be a reputable news organization acted with a breathtaking malice, fraud and criminality. CNN, through its' agents, its producers, directors, anchor men and other employees and agents placed a microfilm of a birth certificate of another person, claiming it to be a microfilm of Obama's birth certificate.

73. Public believed the fraud committed by CNN, believed that indeed that was the microfilm of Obama's birth Certificate.

74. As a result multiple member of the public attacked Plaintiffs, as birthers, particularly attorney Orly Taitz, who led the legal actions, challenging Obama, and subjected them to abuse, harassment, intimidations, threats of bodily harm.

75. Damages suffered by the Plaintiffs are directly, actually and proximately related to fraud committed by CNN.

SECOND CAUSE OF ACTION

RICO

Predicate crime-Fraud

76. Plaintiffs incorporate by reference all prior paragraphs as it relates to FRAUD as if fully pled herein.

"Obama for America" -Racketeering Influenced Corrupt Organization

Barack Hussein Obama created "Obama For America" as his fundraising organization for his Presidential run. At all times Obama was not eligible for the US presidency and he used "Obama for America" as a vehicle to defraud American citizens and get into the position of the U.S. President while using forged documents.

DE-FACTO RICO ENTERPRISE, "ASSOCIATION-IN-FACT" RICO ENTERPRISE

77. Between 2007-2012 defendants acted together or in groups and created an "association-in-fact" enterprise, which is sufficient for RICO, even if "Obama for America" was not a RICO enterprise. Defendants acted directly or indirectly, personally or through agent or agents, employed the same or similar methods of commission with the purpose to defraud, utter forged documents, commit wire and mail fraud, unlawfully procure citizenship and nationalization unlawfully, obstruct justice and intimidate, harass, defame, slander and otherwise retaliate against witnesses, victims, informants and whistleblowers. Plaintiffs were victims of the acts of the racketeering or the acts of racketeering were otherwise interrelated by distinguishing characteristics and were not isolated events.

PATTERN OF ONGOING RACKETEERING ACTIVITY

78. Fraud committed by defendants, who were acting directly or indirectly and committed fraud, which was on going from 2007 until now, for over four years. Actions by the defendants established a pattern of racketeering activity within the meaning of 18 U.S.C. §1962(c), in that their common purpose was to defraud, the common result was to defraud. Plaintiffs were victims of the acts of racketeering and the acts of racketeering were otherwise related by distinguishing characteristics and were not isolated events.

"Obama for America" -Racketeering Influenced Corrupt Organization

Barack Hussein Obama created "Obama For America" as his fundraising organization for his Presidential run. At all times Obama was not eligible for the US presidency and he used "Obama for America" as a vehicle to defraud American citizens and get into the position of the U.S. President while using forged documents.

THIRD CAUSE OF ACTION

RICO-MAIL AND WIRE FRAUD

Plaintiff includes, by reference, all prior paragraphs as if fully pled herein

79. Defendant Obama committed mail and wire fraud, when he posted on the Internet in and around April 27, 2012 a paper, which he claimed to be a true and correct copy of his long form birth certificate.

80. Obama committed mail and wire fraud, when he posted on the Internet on his site "Fight the smears" a paper, which he claimed to be his short form birth certificate.

81. Obama knew that he is committing fraud and intended to defraud in order to continue usurping the position of the U.S. President.

82. Obama committed fraud when he sent to 50 states in 2007-2008, as well as in 2011-2012 his declarations of candidacy. Obama used mail or other instrumentalities of the Interstate commerce to commit such fraud.

83. In and around November 19, 2011 Obama committed mail and wire fraud, when he through his agent, Deputy Campaign Manager Julianna Smoot, personally attacked and defamed Taitz: "RELEASE THE MUGS

By Julianna Smoot, Deputy Campaign Manager on November 19, 2011.

Yesterday, four Republicans in the New Hampshire State House allowed a hearing requested by Orly Taitz, the notorious dentist-lawyer-birther who wants President Obama officially removed from the state's primary ballot. So in honor of conspiracy theorists everywhere, we're re-releasing the campaign's limited-edition "Made in the USA" mugs. There's clearly nothing we can do to satisfy this crowd—or anyone else who insists on wasting time and energy on nonsense like this. But when it starts to make your head hurt, I've found the best remedy is to have some tea in my "Made in the USA" mug. Works like a charm. I recommend Earl Grey."

84. Obama knew that Taitz is submitting to different courts and elections commissions, including Ballot Law commission in New Hampshire true and correct

information showing Obama using all forged IDs and a stolen social Security number.

85. Obama acted with malice and using his employee, his assistant campaign manager he made a fraudulent statement, which he forwarded to millions of people via e-mails and other instrumentalities. This fraudulent statement was made to cover up fraud committed by him and in order to defame Taitz.

Defendants John Doe and Jane Doe, possibly employees of Stanley, inc involved in tampering with Obama's passport records and murder of Lieutenant Quarles Harris in order to cover up forgery in Obama's passport records

More information is in attached report by investigator and Canada Free Press reporter Doug Hagmann:

" The video, defense contractors & Obama

In the "Montagraph video," a connection is drawn to Stanley, Inc. The importance of this, beyond the status as defense contractors from Arlington, Virginia, lies in the digital fingerprints connecting the video *The Innocence of Muslims* with a user with access to the NewsPoliticsNow website. The "Montagraph video" explains the connection by the presence of a common avatar, or an image used by Internet posters. It is here that things become as disturbing as they are convoluted.

According to published reports, Stanley, Inc. was awarded a \$164 million contract to print new U.S. passports in 2006. Two employees of Stanley, Inc., along with a third individual employed by another defense contractor identified as The Analysis Corporation, were identified as the perpetrators who breached the records of the U.S. passport office on three occasions in 2008 and "improperly accessed" the passport records of Barack Hussein Obama, Hillary Clinton and John McCain. **The breaches occurred on January 9, February 21 and March 14, 2008.**

It is important to note that the CEO of the Analysis Corporation at the time of the passport office break-in was **John O. Brennan**, who served as a close advisor to Obama in 2008 on matters of

intelligence and foreign policy. Brennan also contributed to Obama's 2008 presidential campaign. Brennan also had a 25-year career in the CIA.

Presently, John Brennan is chief counterterrorism advisor to Barack Hussein Obama under the official title of Deputy National Security Advisor for Homeland Security and Counterterrorism, and Assistant to the President.

Since 2008, the accepted and unchallenged motive for the breach was that the perpetrators were looking at the passport and biological data on all three presidential candidates in some sort of "exploratory" mission. They were summarily fired from their jobs and disappeared into the night before they could be interviewed by investigators working on the case. **What took place following this admitted breach, however, has an extremely sinister overtone.**

Flashback: 2008 Obama revelation; Key witness to passport office break-in murdered

Recall that at the time of the passport office break-in, Barack Hussein Obama was on the campaign trail as the presumptive Democratic presidential nominee. The news of the breach was made public within a week of the last intrusion, and a week later, on March 21, 2008, Obama was asked for his reaction by ABC News Jake Tapper while campaigning. Obviously, Obama now officially knows that the public has been informed about the level of the breach, and that Obama's personal and confidential biographical information, in addition to his international travels was apparently "accessed."

It is important to note that the files accessed included Obama's personal passport and not limited to his diplomatic passport.

On April 8, 2008, Obama continued to comment on the fact that the confidentiality of his passport records were apparently compromised. It was on this occasion when *Obama admitted, for the first time in any public venue as a presidential candidate, that he traveled to Pakistan in 1981*. One wonders whether Obama would have disclosed his Pakistan trip at this time had it not been for the uncertainty that the information was already "in play."

Even ABC News appeared surprised at this sudden and unexpected revelation, considering all of the talk about Pakistan and U.S. foreign policy during the previous several months. Research shows that Obama did not disclose this trip at any time during any policy discussions or debates *prior to* the passport office breach.

It is also important to point out that during the investigation of the breach of the passport office records, the *Washington Times* reported that "officials do not know whether information was improperly **copied, altered or removed** from the database during the intrusions" [Emphasis added]. As time progressed, however, so did the leaks. It was reported that at least one employee within the U.S. State Department shared passport information with a man identified as **Lieutenant Quarles Harris Jr.**

My investigation suggests that Harris was the intended recipient of stolen credit card information from the State Department employee, but received more than what he bargained for. When he realized the scope of the crime and the explosive nature of the information he possessed, he turned to investigators for protection. He also began to talk with investigators and ultimately, made a deal with federal prosecutors.

Before he could make good on his deal, Lieutenant Quarles Harris Jr. was found shot to death in his car on April 17, 2008, just over a month after the last breach. He was found in front of the Judah House Praise Baptist Church in the northeast section of Washington. He had been shot in the head.

The murder of Harris remains unsolved, and the official narrative of that murder is that Harris was either a victim of random violence, or his murder was a result of a "street deal gone bad."

Jane Does and John Does involved in homicide of Donald Young and Larry Bland

FOURTH CAUSE OF ACTION

RICO

PREDICATE CRIME-MISPRISION OF FELONY-

United States Code Title 18 § 4 Misprision of Felony

(MISPRISION OF SOCIAL SECURITY FRAUD COMMITTED BY OBAMA)

86. Title 18, §4 Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States is guilty of the federal crime of misprision of felony, shall be fined not more than \$500 under this title or imprisoned not more than three years, or both.

(all defendants aside from Defendants Feinstein, Emken, Logan)

- a. Defendants were put on notice of felony of Social Security Fraud, namely Barack Obama using a stolen Connecticut Social security number xxx-xx-4425, which was never assigned to Obama according to E-Verify and SSNVS
- b. Defendants committed Misprision of Felony by concealing this fact and not making it known to a judge or other person in civil or military authority

FIFTH CAUSE OF ACTION

RICO

PREDICATE CRIME-MISPRISION OF FELONY

United States Code Title 18 § 4 Misprision of Felony

(MISPRISION OF ELECTIONS FRAUD BY OBAMA)

87. Defendants received from Plaintiffs evidence of Obama committing elections fraud by claiming to be a legitimate candidate for the U.S. Presidency, while in fact not being eligible and being on the ballot by virtue of fraud and by false pretenses, while using forged identification papers: forged birth certificate, forged selective service certificate, and forged Social Security ID.

Defendants committed Misprision of Felony by concealing this fact and not making it known to a judge or other person in civil or military authority.

SIXTH CAUSE OF ACTION

RICO

PREDICATE CRIME-MISPRISION OF FELONY

United States Code Title 18 § 4 Misprision of Felony

**(MISPRISION OF USE OF A FORGED POSTAL STAMP ON THE
SELECTIVE SERVICE CERTIFICATE BY OBAMA)**

Plaintiffs incorporate by reference all prior paragraphs as if fully pled herein

88. Defendants received from Plaintiffs evidence of Obama using a forged postal stamp on the Selective service certificate he is using. Defendants committed Misprision of Felony by concealing this fact and not making it known to a judge or other person in civil or military authority.

SEVENTH CAUSE OF ACTION

VIOLATION UNDER THE COLOR OF AUTHORITY

**OF 1ST/14TH AMENDMENT RIGHT-FREEDOM OF FREE SPEECH OF
THE U.S. CONSTITUTION**

(AGAINST DEFENDANTS FEDERAL AND STATE AGENCIES)

89. Plaintiffs incorporate by reference all prior paragraphs as if fully pled herein.

90. First amendment of the U.S. Constitution and 14 th Amendment as available to the States prohibits violation of the Free Speech by the Federal and State governmental agencies.

91. Lawful voting represents the highest embodiment, the highest manifestation of the Free Speech. Any action by the Federal or state agency is seen under the "Highest Scrutiny " test.

92. When representatives of Federal or State agencies under color of authority are aiding and abetting a criminal with forged IDs to run for the U.S. Presidency, they de- facto rob the citizens of their most secret right to a political free speech, as they enable the usurpation of the U.S. Presidency by a foreign citizen with all forged Identification Papers, they rob the citizens of their right to free election, turning elections into a sham, a well choreographed Hollywood production without any substance behind it.

93. As an actual and proximate result of the actions by the Defendants , the First /Fourteenth Amendment right to free speech of the Plaintiffs was violated.

94. First amendment right for Political Free Speech of Plaintiff Taitz was also violated by Defendant Judge Clay D. Land.

Taitz, as an attorney, brought in front of Land two legal actions on behalf of members of the U.S. military, seeking verification legitimacy of Obama in light of his use of a forged Birth Certificate, forged Selective Service Certificate and fraudulently obtained Social Security number.

Land desired to silence political opposition to Obama regime.

Land abused his judicial discretion and abused Taitz and her clients verbally, psychologically and financially.

Land's actions were aimed to silence political speech against Obama's usurpation of the U.S. Presidency.

Land frivolously and callously attacked Taitz, claiming that bringing a legitimate legal action against Obama is somehow frivolous, and used his opinion and sanctions against Taitz as means of intimidation of political dissidents, civil rights attorneys and members of the U.S. military who were seeking Obama's removal from office due to his use of forged IDs.

95. Actions by the Defendants had a chilling effect on the free political speech of the Plaintiffs and every political dissident in the U.S.

96. Damages to civil right of political free speech, as well as financial damage of \$20,000, associated costs and fees, legal fees, damage as a result of defamatory

statements in the opinion by Land, psychological damages and emotional distress associated with actions by Land.

EIGHTH CAUSE OF ACTION

VIOLATION OF THE FIRST AMENDMENT / 14TH AMENDMENT

RIGHT FOR REDRESS OF GRIEVANCIES UNDER COLOR OF

AUTHORITY

(against defendants Federal and State Agencies and Defendant Land)

97. Plaintiffs brought their grievances relating to Obama's use of forged and fraudulently obtained IDs to Defendant's officials of the Federal and State governments.

98. Defendants violated Plaintiffs rights, did not provide a redress of Plaintiffs grievances and were complicit in Obama's violations of Plaintiff's rights.

99. Plaintiffs suffered damages as a result of violations by the Defendants.

Additionally Plaintiff Taitz suffered a violation of her right for redress of grievances by Defendant Land, who as a Presiding Judge arbitrarily refused to address grievances by Taitz's clients claiming abstention and attacked Taitz and her clients with defamatory statements and sanctions in order to intimidate other dissidents and civil rights attorneys and prevent them from seeking a redress of

grievances against Obama's usurpation of the U.S. presidency and against him placing his name on the ballot in 2012 election.

NINETH CAUSE OF ACTION

VIOLATION OF 5TH AMENDMENT OF DUE PROCESS AND 14TH AMENDMENT EQUAL PROTECTION RIGHTS OF THE PLAINTIFFS UNDER COLOR OF AUTHORITY.

100. Plaintiffs incorporate by reference all prior paragraphs.

Plaintiffs were entitled to Due Process and Equal Protection.

Their rights were infringed upon by defendants Federal and State Agencies.

While State Agencies routinely removed from the ballots ineligible candidates, Defendants refused to do that with candidate Obama.

101. Additionally Plaintiff Taitz was denied her Due Process and Equal Protection rights by Judge Clay D. Land when he denied her due process and sanctioned her without giving her due process hearing on the issue of sanctions.

TENTH CAUSE OF ACTION

DEFAMATION

Plaintiff includes, by reference, all prior paragraphs as if fully pled herein

102. Obama directly and through his agents was committing fraud, while at the same time defaming and harassing Taitz and other plaintiffs, calling them "a side show" and "carnival barkers". On April 27, 2012 he released a forgery claiming it to be a true and correct copy of his long form birth certificate and simultaneously defamed plaintiffs calling them "carnival barkers" and "a side show". Obama acted with malice and made a defamatory statement, which was understood by others as relating to plaintiffs, which lowered Plaintiff's standing in the community and caused damages.

103. Plaintiffs suffered defamation and humiliations, being attacked as "birthers", were called crazy, while they were telling the truth about the fact that defendant Obama is committing elections fraud and is using and uttering forged documents as proof of his eligibility for the U.S. Presidency.

104. Plaintiff Taitz received multiple death threats from Obama supporters who do not believe that their "messiah" is capable of committing elections fraud and use forged documents

105. From 2008 campaign until now Taitz and other Plaintiffs and patriots of this country suffered a total of nearly four years of humiliation, defamation, slander,

persecutions, harassment, sanctions, tampering with vehicles, attacks on their families by some of the defendants.

106. John Avalon, a reporter for Daily Beast, a writer, contributor to CNN and Newsweek engaged in systemic defamation of Taitz.

Avlon started by yelling and screaming at her and her client former U.N. Ambassador Alan Keyes, while appearing together on CNN.

Later Avlon contacted Taitz and told her that he apologizes for his behavior and would like to fly from New York to California and do an in depth interview.

Taitz agreed to give an interview to Avlon.

Avlon flew to California and interviewed Taitz for about two hours, at which time Taitz provided him with the information relating to fraud and forgery in Obama's IDs, which is described in paragraphs 1-23 herein.

Additionally Avlon asked her for a number of books and video tapes Taitz had on the subject, which Taitz gave him.

Avlon never published any information that Taitz gave him regarding Obama and continued defrauding the public by claiming that Obama is legitimate for the position of the President.

Additionally Avlon published a book called "Wingnuts", where he included Taitz among other politicians, that he called "Wingnuts".

107. When Taitz ran for the U.S. Senate in 2012 and according to 4 consecutive polls by Public Policy Polling, only one day before the election, Avlon published in Daily Beast a hit job defamatory article about Taitz, which was republished by multiple other magazines and newspapers.

Avlon knew that no judge have ruled on the merits of the case.

Avlon knew that Sheriff Arpaio held multiple press conferences, where he presented evidence showing Obama using forged birth certificate and Selective service certificate

Avlon had evidence that Obama is using a Connecticut Social Security number, which was not assigned to him.

Avlon knew that no judge has ever seen an original birth certificate for Obama, an original application for Selective Service and an original application for Connecticut Social Security number that Obama is using, while copies were found to be forgeries by Sheriff Arpaio and other experts. Avlon acted with malice, aided and abetted and attacked and defamed Taitz with a clear goal of derailing her campaign.

Avlon was criminally complicit with Obama and viciously misrepresented the truth defamed Taitz in order to aid and abet Obama in cover up of Obama's elections fraud and Obama's forged IDs. On June 5th 2012, the elections day for the U.S. Senate he wrote an article in "Daily Beast" (Exhibit 26) He wrote:

"I've met Taitz, debating her on-air once and spending an hour at her law office/dental practice in the hills of Rancho Santa Margarita while I was researching Wingnuts. She is not unintelligent and is almost charmingly insane, proudly showing off prominent alleged Facebook friends and then comparing Obama to Stalin, all while passing over hundreds of pages of Xeroxed documents she has sent to governors of all 50 states and the entire U.S. Senate. The packet details accusations including impersonation of a military officer, libel, defamation of character, harassment, breaking into the computer system of the Supreme Court, voter fraud, and forgery, concluding: "Verify the above facts brought forward by me and demand Obama/Soetoro's immediate resignation or removal from office due to fraud and constitutional inability. National security and national survival depends on your expedient actions ..."

In other words, nut-balls. Orly Taitz as a candidate for U.S. Senate would make Christine O'Donnell look like Henry Clay. She would make Sharron Angle look like Daniel Webster. Donald Trump seems a model of restraint by comparison."

Avlon referred to Taitz as a "national embarrassment", "wingnut", "nutball", "radioactive destruction", "crazy", "freak beat", "fringe", "insane", "clownishly unelectable candidate".

108. As most readers of "Daily Beast" and "Forbes magazine" do not follow this litigation, they believe that those magazines are reputable publications. They believe that reporters are legitimate reporters who do not commit journalistic malpractice and who do not defame individuals. The public believed that Avlon and other reporters, such as Kevin Underhill from Forbes, who republished Avlon's hit piece, are writing the truth.

109. Taitz standing in the community was affected, as a result of defamation by Avlon and other members of the media listed herein.

110. Public clearly understood that statements were made about Taitz, understood those statements to be true and Taitz standing in the community was affected and reduced as a result of actions by Avlon. Damages suffered by Taitz are actually and proximately related to actions by Avlon.

g) Fraud by Defendant Land

Defendant Clay D. Land (Hereinafter "Land") aided and abetted Obama in elections fraud, use of forged Identifications papers for purpose of elections fraud.

Taitz presented to US District Judge of the Central District of Georgia, Clay D. Land, two cases brought by officers of the US military against Barack Hussein Obama.

Over 200 members of the U. S. military signed consent forms wishing to be clients of attorney Orly Taitz challenging Barack Obama as ineligible for the position of the US.

President and Commander in Chief. Taitz brought legal actions on their behalf in different courts around the nation. Two of these actions were brought in Columbus GA in front of Federal Judge Clay D. Land.

The first action was brought by Taitz originally on behalf of Major Cook and later joined by Major General Childers and Lieutenant Colonel Earl Graef.

Taitz provided Land with evidence showing that Obama does not have a valid birth certificate and does not have a valid Social Security number.

Taitz provided Land with a sworn affidavit of licensed investigator Neil Sankey.

Sankey is also a former Scotland Yard officer who served in an elite unit dealing with organized crime and communist proliferation. Sankey provided a 44 page affidavit, which showed that according to most reliable national databases used by the licensed investigators and attorneys such as Lexis Nexis and Choice Point there are multiple Social Security numbers used by Barack Obama, none of which was issued in the state of Hawaii, where Obama grew up and started working and was supposed to obtain a SSN. Major Cook, who was a highly decorated US officer and who was supposed to be deployed to Afghanistan within days, was asking a stay/ injunction of his deployment until Obama's legitimacy to the US Presidency and validity of his Identification papers is ascertained by the court. Knowing that Obama does not possess any valid papers and in order to avoid the embarrassment, the military rescinded the deployment orders for Cook. This was done within hours before the scheduled hearing.

Taitz brought a motion seeking to join Major General Childers and Lieutenant Colonel Earl Graef, arguing that even if Cook's deployment orders were rescinded, the issue is not moot, that this case is akin to Roe v Wade 410 U.S. 113 (1973), in that this is an issue which presents itself repeatedly before the court but eludes resolution on the merits. Land dismissed the case by all plaintiffs against all defendants, denied all plaintiffs their First Amendment rights of redress of grievances and wrote a demeaning and defamatory opinion about both Plaintiffs and Taitz. As a result, as the case was never heard on the merits and Plaintiffs were denied their right to present their case, Major Cook was fired from his position as an analyst with a company providing defense contracts. Retired Major General Childers lost several consulting contracts and believed that it was in retaliation for his involvement in this action. Shortly thereafter another officer, Flight Surgeon Sergeant Connie Rhodes was supposed to be deployed. She asked Taitz to represent her in a similar action. By that time Obama administration was concerned that further revocation of orders might seriously affect deployment.

Land decided to use this case and Taitz in particular as an example, showing that the establishment will persecute anyone who dares to represent active members of the military against usurper Obama. Land could not deny standing as Rhodes was supposed to deploy within days. Land dismissed the case based on the doctrine of abstention, stating that this is a matter for the military to decide. He claimed that this is a matter for the military to decide, even though Taitz provided Land with a letter by

Commander Crawford, counsel for Admiral Mullin, Chairman of Joint Chief of Staff, where Crawford stated that the military is concerned with the situation, but cannot do anything as Obama is a civilian and not a member of the military. Land did not limit himself with wrongfully denying Rhodes her First Amendment civil right of Redress of Grievances under the color of authority, but he also wrote a defamatory and demeaning ruling. Land also assessed \$20,000 of sanctions against Taitz claiming that it was frivolous to bring legal actions against Obama on behalf of active members of the U.S. military. There was no justification for sanctions. The only reason Land did it, was to try to silence Taitz, as a federal whistleblower, and to aid and abet in the cover up of Obama's forged IDs. Land knew that he has in front of him evidence of the biggest security breach in the history of this nation. He had evidence of Obama using fraudulent Social Security numbers, including two numbers in his own back yard in Columbus, GA. Land knowingly and with malice aided and abetted Social Security fraud and elections fraud by refusing to hear the cases on the merits, even though the plaintiffs had standing and by abusing his authority and position of a federal judge, to verbally and financially abuse Taitz and harass her with sanctions in order to stop litigation against Obama. Land further abused plaintiffs' civil right for redress of grievances by refusing to hear the case on the merits, even though the plaintiffs had standing by his own admission. Land abused Taitz rights under the color of authority by assessing her \$20000 of sanctions without allowing her a hearing on the issue of sanctions. Taitz and her plaintiffs were the whistleblowers against Obama. Through his actions Land engaged in intimidation of a whistleblower in order to cover up crimes committed by Obama. Members of the media used demeaning and defamatory comments by Land in order to assassinate her character. In a number of cases attorneys were not willing to work with her because of demeaning comments and sanctions assessed by Land. Taitz suffered a damage of \$20, 000. All of the Plaintiffs suffered damage, as Lands ruling was used by other courts, and other plaintiffs were denied their right for redress of grievances against Obama's usurpation of the U.S. Presidency, when U.S. attorneys and AG attorneys used Land's decision to attack Taitz and others in different courts. All of the defendants acted with an intent to defraud. Plaintiffs were intended victims and foreseeable victims. Plaintiffs suffered financial damages, defamation, humiliation, harassment and emotional distress as a result of fraud committed by the Defendants. Further Taitz is seeking discovery on possible connection between Land and 3 Social Security numbers used by Obama in Georgia according to databases. Taitz is seeking further discovery of connection between Land and one Beny Edwards.

4. List the alleged victims and state how each victim was allegedly injured.

Taitz, as listed previously, lost over \$500,000 in income in her dental practice due to a campaign of character assassination conducted by the defendants, harassment and intimidation of dental clients and dental insurance companies, over \$500,000 loss in her law practice due to harassment and intimidation of clients, witnesses and judges in her cases, over \$400,000 in lost rental income due to intimidation and harassment of tenants, \$10,000 in legal fees due to actions of Scott J. Tepper (see above), \$20,000 due to actions of Clay D. Land (see above). Estimated Over \$500,000 in lost income and in repair fees due to constant vandalism and destruction of web sites, e-mail accounts, tampering with cars, constant vandalism of computers, electric circuits in the office. Other plaintiffs in this case suffered from acts of vandalism of vehicles and vandalism and hacking of web sites and e-mail accounts

5. Describe in detail the pattern of racketeering activity or collection of unlawful debts alleged for each RICO claim. A description of the pattern of racketeering shall include the following information:

a. List the alleged predicate acts and the specific statutes which were allegedly violated;

see described above in question 4

b. Provide the dates of the predicate acts, the participants in the predicate acts, and a description of the facts surrounding the predicate acts;

predicate acts of forgery by John Does, uttering of forged IDs, fraud, elections fraud, wire fraud, intimidation of whistle blowers mail fraud are ongoing continuously since 2008, possibly earlier

c. If the RICO claim is based on the predicate offenses of wire fraud, mail fraud, or fraud in the sale of securities, the "circumstances constituting fraud or mistake shall be stated with particularity." Fed. R. Civ. P. 9(b). Identify the time, place and contents of the alleged misrepresentations, and the identity of persons to whom and by whom the alleged misrepresentations were made;

Obama's forged IDs were released as genuine and entered in the stream of national and international commerce. this was done repeatedly and continuously. One of such dates was on April 27, 2011, when Obama released a forgery, claiming it to be a copy of his genuine long form birth certificate.

In and around summer of 2008 Obama released a forgery claiming to be his short form birth certificate.

In and around April 15 2010 Obama released his tax returns, containing a forged/fraudulent;y obtained Social security number xxx-xx-4425

During 2008 campaign Obama used multiple forged/ fraudulently obtained Social Security numbers believed to have been used for donation receipts.

d. State whether there has been a criminal conviction for violation of the predicate acts;

Not yet, however there was criminal investigation of Vivek Kundra and Yusuf Aqair believed to have been complicit in forgeries as John Does in this case

It is believed that Obama used as accomplices members of the communist "Weatherman" underground, some of whom were previously convicted, among the William Ayers and Bernardine Dohrn

There is a criminal investigation into deaths of Donald Young, Larry Blend, Lieutenant (name, not title) Querles Harris

It is believed that their deaths were connected to this RICO conspiracy

e. State whether civil litigation has resulted in a judgment in regard to the predicate acts; Not yet

f. Describe how the predicate acts from a "pattern of racketeering activity"; and

fraud, uttering of forged IDs, wire and mail fraud, intimidation of whistle blowers, elimination of witnesses were used in a scheme to defraud 314 million americans, usurp U.S. Presidency a foreign national, syphon billions of dollars from the U.S. treasury, undermine U.S. National security

g. State whether the alleged predicate acts relate to each other as part of a common plan. If so, describe in detail.

yes, see detailed explanation above, in previous questions

6. Describe in detail the alleged enterprise for each RICO claim. A description of each enterprise shall include the following information
Was described above

2

Case 3:12-cv-00280-HTW-LRA Document 2 Filed 04/25/12 Page 3 of 5

- a. State the names of the individuals, partnerships, corporations, associations, or other legal entities, which allegedly constitute the enterprise; see described above
- b. Describe the structure, purpose, function and course of conduct of the enterprise; see described above
- c. State whether any Defendants are employees, officers or directors of the alleged enterprise;

defendants are a part of the enterprise and are associated with it,
more discovery is needed to provide a more detailed answer

- d. State whether any Defendants are associated with the alleged enterprise; yes, they are
- e. State whether you are alleging that the Defendants are individuals or entities separate from the alleged enterprise, or that the Defendants are the enterprise itself, or are members of the enterprise; and

defendants are both individuals and a part of several RICO enterprises, among them "Obama for America", "Fogbow" and others

f. If any Defendants are alleged to be either the enterprise itself or members of the enterprise, explain whether such Defendants are perpetrators, passive instruments, or victims of the alleged racketeering activity.

Perpetrators

7. State whether you are alleging that the pattern of racketeering activity and the enterprise are separate or have merged into one entity. In either event, describe in detail.

several enterprises were acting in concert

8. Describe the alleged relationship between the activities of the enterprise and the pattern of racketeering activity. Discuss how the racketeering activity differs from the usual and daily activities of the enterprise, if at all.

racketeering activity was the activity, conducted with the purpose of defrauding the citizens, placing a foreign citizen with forged IDs in the White House. Most if not all of the activity of "Obama for America" and "Fogbow" was a racketeering activity

9. Describe what benefits, if any, the alleged enterprise receives from the alleged pattern of racketeering.

10. Describe the effect of the activities of the enterprise on interstate or foreign commerce. 2 billion dollars were collected from citizens under false pretenses. Nearly 6 trillion debt was incurred in 4 years by a foreign usurper with forged IDs

11. If the complaint alleges a violation of 18 U.S.C. § 1962(a), provide the following information:

a. State who received the income derived either from the pattern of racketeering activity or through the collection of an unlawful debt; and

Barack Obama, "Obama for America, "Fogbow", members of "Fogbow",
defendants, George Soros, donors to Obama and "Obama for America"

b. Describe the use, investment or locus of such income.

Income came from fund raising under false pretenses, from the usurpation of the U.S. Presidency and expenditure from the U.S. treasury under false pretenses

12. If the Complaint alleges a violation of 18 U.S.C. § 1962(b), describe in detail the acquisition or maintenance of any interest in or control of the alleged enterprise.

Obama for America, a RICO organization has raised close to a billion dollars in 2008 and reported billion dollars in 2012. Obama and Obama for America raised this money by fraud and under false pretenses, claiming that Obama is a legitimate candidate for the US president, while in reality he is an illegal usurper, a citizen of Indonesia with forged IDs

Obama has caused an unprecedented nearly 6 trillion dollars debt during 4 years of the usurpation of the U.S. Presidency. During this time he engaged in schemes where he reimbursed his donors, mostly owners of "green energy" schemes enormous payouts, at a reate of \$25,000 per \$1 of donations. Peter Schwizer "THROW THEM ALL OUT"

13. If the complaint alleges a violation of 18 U.S.C. § 1962(c), provide the following information:

a. State who is employed by or associated with the enterprise; and all of the defendants and parties described in questions 1-12

b. State whether the same entity is both the liable "person" and the "enterprise"

under § 1962(c).

yes

14. If the complaint alleges a violation of 18 U.S.C. § 1962(d), describe in detail the alleged conspiracy.

See described in detail above in questions 1-12

15. Describe the direct causal relationship between the alleged injury and the violation of the RICO statute.

see described above question 1-12

16. List the actual damages for which Defendant is allegedly liable.
see described above questions 1-12

17. List all other federal causes of action, if any, and provide citations to the relevant statute(s).

see filed petition to the Panel on multidistrict litigation to coordinate and consolidate cases filed herein

18. List all pendent state claims, if any.
see filed petition to the Panel on multidistrict litigation to coordinate and consolidate cases filed herein

19. Provide any additional information that you feel would be helpful to the Court in considering your RICO claim.

This the 25th day of November, 2011.

UNITED STATES DISTRICT COURT

4

FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI

BY: J. T. NOBLIN, CLERK OF COURT

BY: N. Dean, D.C.

/s/ Dr. Orly Taitz, ESQ

5